

EXHIBIT O

Atkinson-Baker, Inc.
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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----x

4 Eastern Profit CORPORATION LIMITED,
5 Plaintiff,

6 -against- Case No. 18-cv-2185 (JGK)

7 Strategic Vision US, LLC,
8 Defendant.

9 -----x

10 August 2, 2019
11 9:51 a.m.

12

13 Deposition of GUO WENGUI, held at the offices of Hodgson
14 Russ, 605 Third Avenue, Suite 2300, New York, New York,
15 pursuant to Notice, before Renate Reid, Registered Professional
16 Reporter and Notary Public of the State of New York.

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<p>1 APPEARANCES:</p> <p>2</p> <p>3 ZEICHNER ELLMAN & KRAUSE LLP</p> <p>4 Attorneys for Plaintiff</p> <p>5 One Landmark Square, Suite 420</p> <p>6 Stamford, CT 06901</p> <p>7 BY: ZACHARY GRENDI, Esq.</p> <p>8 zgrendi@zeklaw.com</p> <p>9</p> <p>10 GRAVES GARRETT LLC</p> <p>11 Attorneys for Defendant/Counterclaim Plaintiff</p> <p>12 1100 Main Street, Suite 2700</p> <p>13 Kansas City, MO 64105</p> <p>14 BY: EDWARD D. GREIM, Esq.</p> <p>15 Telephone: (816) 256-3181</p> <p>16 edgreim@gravesgarrett.com</p> <p>17</p> <p>18 HODGSON RUSS LLP</p> <p>19 Attorneys for Witness</p> <p>20 605 Third Avenue, Suite 2300</p> <p>21 New York, NY 10158</p> <p>22 BY: MARK A. HARMON, Esq.</p> <p>23 mharmon@hodgsonruss.com</p> <p>24 ERIN TESKE, ESQ.</p> <p>25 eteske@hodgsonruss.com</p> <p>ALSO PRESENT:</p> <p>Yvette Wang</p> <p>Daniel Podhaskie</p> <p>French Wallop</p> <p>Michael Waller</p> <p>Jianhang Mai - Mandarin Interpreter</p> <p>Una Wilkinson - Check Interpreter</p> <p>Joe Delvecchio - Videographer</p> <p style="text-align: right;">Page 2</p>	<p>1 Guo Wengui</p> <p>2 VIDEOGRAPHER: Good morning. I am Thomas</p> <p>3 Delvecchio, your videographer, and I represent</p> <p>4 Atkinson-Baker, Inc., in Glendale, California. I</p> <p>5 am not financially interested in this action, nor 09:51</p> <p>6 am I a relative or employee of any attorney or any</p> <p>7 other parties.</p> <p>8 Today's date is Friday, August 2, 2019.</p> <p>9 The time is approximately 9:51 a.m.</p> <p>10 This deposition is taking place at 09:51</p> <p>11 Hodgson Russ, 605 Third Avenue, New York, New</p> <p>12 York. The case number is 18-cv-2185(JGK),</p> <p>13 entitled "Eastern Profit Corporation Limited,</p> <p>14 Plaintiff/Counterclaim Defendant, versus Strategic</p> <p>15 Vision USA, LLC, Defendant/Counterclaim Plaintiff. 09:52</p> <p>16 The deponent today is Guo Wengui --</p> <p>17 excuse me -- Mr. Guo Wengui. This deposition is</p> <p>18 being taken on behalf of Defendant's counsel.</p> <p>19 Your court reporter today is Renate Reid, from</p> <p>20 Atkinson-Baker, Inc. 09:52</p> <p>21 Will counsel please introduce themselves.</p> <p>22 After counsel present have introduced themselves,</p> <p>23 then the witness gets sworn in by the court</p> <p>24 reporter.</p> <p>25 MR. GREIM: Taking the deposition for 09:53</p> <p style="text-align: right;">Page 4</p>
<p>1 INDEX</p> <p>2 WITNESS: Guo Wengui</p> <p>3 EXAMINATION BY: PAGE</p> <p>4 Mr. Greim 5</p> <p>5 DEFENDANT EXHIBIT PAGE</p> <p>6 1, notice of deposition 12</p> <p>7 2, Document Bates-labeled pages 164</p> <p>8 Eastern 276 to 277</p> <p>9 3, 7-page document with Arabic 220</p> <p>10 numbers 1 through 9 in the middle of</p> <p>11 first page</p> <p>12 4, 5-page article 224</p> <p>13</p> <p>14 PREVIOUSLY MARKED EXHIBIT</p> <p>15 12, document indexed SVUS000171 52</p> <p>16 through SVUS000259</p> <p>17 2, Research Agreement dated 12/29/17 161</p> <p>18</p> <p>19 REQUEST</p> <p>20 REQ 71</p> <p>21</p> <p>22 DIRECTION NOT TO ANSWER: 8, 9, 10, 11, 25, 26, 27, 32, 33,</p> <p>23 35, 36, 37, 41, 60, 61, 62, 64, 70, 71, 110, 115, 121, 168,</p> <p>24 185, 186, 187, 188, 193, 194, 223, 224</p> <p>25</p> <p style="text-align: right;">Page 3</p>	<p>1 Guo Wengui</p> <p>2 the Defendant/Counterclaim Plaintiff, Strategic</p> <p>3 Vision US, LLC, Eddie Greim, Graves Garrett LLC.</p> <p>4 MR. GRENDI: For Plaintiff/Counterclaim</p> <p>5 Defendant, Eastern Profit Corporation Limited, 09:53</p> <p>6 Zachary Grendi, of Zeichner Ellman & Krause.</p> <p>7 MR. HARMON: Mark A. Harmon, Hodgson</p> <p>8 Russ LLP, for the nonparty witness.</p> <p>9 G U O W E N G U I, called as a</p> <p>10 witness, having been first duly sworn by the 09:53</p> <p>11 Notary Public, was examined and testified as</p> <p>12 follows:</p> <p>13 EXAMINATION BY</p> <p>14 MR. GREIM:</p> <p>15 Q. Mr. Guo, good morning. Just a couple 09:54</p> <p>16 of initial questions.</p> <p>17 Before we began today, as we were</p> <p>18 gathering around the table, I heard you speaking a</p> <p>19 little English.</p> <p>20 Is it fair to say you understand some 09:54</p> <p>21 English but are not fluent in English?</p> <p>22 A. I can understand a little bit of</p> <p>23 English.</p> <p>24 Q. Can you read English in Roman</p> <p>25 lettering? 09:55</p> <p style="text-align: right;">Page 5</p>

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<p>1 Guo Wengui</p> <p>2 question.</p> <p>3 A. No.</p> <p>4 BY MR. GREIM:</p> <p>5 Q. Was it important to you, before 04:03</p> <p>6 entering -- strike that.</p> <p>7 Was it important to you that Strategic</p> <p>8 Vision be licensed as investigators?</p> <p>9 MR. GRENDI: Object to the form.</p> <p>10 A. So the first time -- the first time we 04:04</p> <p>11 met, they already told us they have all the</p> <p>12 investigative licenses and all the legal licenses.</p> <p>13 They told me that. And they also boasted about</p> <p>14 their European teams. And then the gentleman</p> <p>15 boasted about his experience with the CIA, the 04:05</p> <p>16 so-called Black Water Company. They told me they</p> <p>17 are fully licensed firm with years and years of</p> <p>18 experience. They mention that they were helping</p> <p>19 to get Trump elected and helping the Republican</p> <p>20 Party, and then they also boasted about helping 04:05</p> <p>21 forces in Russia that were going against Putin.</p> <p>22 And they told me that, you know, they had all the</p> <p>23 licenses necessary. They had all the resources</p> <p>24 and all the teams in place to help do the</p> <p>25 investigation. 04:05</p> <p style="text-align: right;">Page 150</p>	<p>1 Guo Wengui</p> <p>2 MR. HARMON: Object to the form of the</p> <p>3 question.</p> <p>4 A. This lady told me that she could</p> <p>5 connect me with anybody within CIA. Also -- the 04:07</p> <p>6 gentleman also made that claim, and I did not have</p> <p>7 all that resources to connect to anybody at CIA.</p> <p>8 So they mentioned that they could connect me to</p> <p>9 anybody within CIA. Back then, I did not have any</p> <p>10 contacts with CIA. 04:07</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Wait a minute.</p> <p>13 When did you begin to have contacts with</p> <p>14 the CIA and FBI?</p> <p>15 MR. HARMON: Object to the form of the 04:07</p> <p>16 question.</p> <p>17 A. I do not have contact with CIA. I did</p> <p>18 not have contact with CIA. I was waiting on these</p> <p>19 two individuals to connect me to CIA.</p> <p>20 BY MR. GREIM: 04:08</p> <p>21 Q. And you eventually did make contact</p> <p>22 with the FBI and CIA, correct?</p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question.</p> <p>25 A. No. 04:08</p> <p style="text-align: right;">Page 152</p>
<p>1 Guo Wengui</p> <p>2 Of course, without licenses, why would I</p> <p>3 have partnered up with them? Why would I have</p> <p>4 worked with them? I would not even have paid</p> <p>5 attention to them. 04:05</p> <p>6 BY MR. GREIM:</p> <p>7 Q. Did you check to ensure that they were</p> <p>8 in fact licensed?</p> <p>9 MR. GRENDI: Object to the form.</p> <p>10 A. I did not do any check. 04:06</p> <p>11 BY MR. GREIM:</p> <p>12 Q. Now, at that time, you employed T&M</p> <p>13 Security, didn't you?</p> <p>14 MR. HARMON: Object to the form of the</p> <p>15 question. 04:06</p> <p>16 A. I don't remember. I can't be sure.</p> <p>17 BY MR. GREIM:</p> <p>18 Q. And they are licensed private</p> <p>19 investigators, are they not?</p> <p>20 A. I don't know. 04:06</p> <p>21 Q. Have you ever checked to see whether</p> <p>22 they were licensed?</p> <p>23 A. I did not. No, I did not check.</p> <p>24 Q. Did you check with your contacts at the</p> <p>25 CIA and FBI about Strategic Vision? 04:06</p> <p style="text-align: right;">Page 151</p>	<p>1 Guo Wengui</p> <p>2 BY MR. GREIM:</p> <p>3 Q. Haven't you publicly stated recently</p> <p>4 that you've had hundreds of contacts with the FBI</p> <p>5 and CIA? 04:08</p> <p>6 MR. GRENDI: Objection to the form.</p> <p>7 A. I don't recall that.</p> <p>8 BY MR. GREIM:</p> <p>9 Q. Okay. Let's go back.</p> <p>10 Did you have T&M Security do an 04:09</p> <p>11 investigation into Strategic Vision before the</p> <p>12 contract negotiation?</p> <p>13 MR. GRENDI: Objection to the form.</p> <p>14 A. No.</p> <p>15 BY MR. GREIM: 04:09</p> <p>16 Q. Did you have them do an investigation</p> <p>17 into Strategic Vision while it was performing the</p> <p>18 contract?</p> <p>19 A. No.</p> <p>20 Q. Did you have anyone do an investigation 04:09</p> <p>21 into Strategic Vision before beginning contract</p> <p>22 negotiations?</p> <p>23 MR. HARMON: Object to the form of the</p> <p>24 question.</p> <p>25 MR. GRENDI: Objection to form. 04:10</p> <p style="text-align: right;">Page 153</p>

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